

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
MARC VAN PATTEN-STEIGER)
Case No. 04-cr-10006-DPW

JOINT MOTION TO EXCLUDE TIME

The United States, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Seth P. Berman, and the defendant, by and through his attorney Syrie Fried, Esq., move, pursuant to 18 U.S.C. §3161 (h)(8)(A), to exclude the period of time commencing on July 7, 2004 and ending on August 4, 2004. As grounds therefor, the parties state that the interests of justice are best served by allowing the parties additional time to negotiate a possible plea agreement.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice served by granting the requested continuance and exclusion outweigh the best interest of the public and the defendant in a speedy trial, and, accordingly, grant the continuance as requested above and exclude the above period in computing the time within which trial must commence under 18 U.S.C. §3161.

Respectfully Submitted,

MICHAEL J. SULLIVAN
United States Attorney
By:

/s/ Seth P. Berman
SETH P. BERMAN
Assistant U.S. Attorney
(617) 748-3385

MARC VAN PATTEN-STEIGER
By:

/s/ Syrie Fried
Syrie Fried, Esq.
(617) 223-8061

July 12, 2004